

UNITED STATES OF AMERICA
DISTRICT OF MASSACHUSETTS

UNITED STATES

V.

No. 04-10129-RCL

NICHOLAS ANASTASIADES

MOTION TO AMEND CONDITIONS OF PRE-TRIAL RELEASE

Now comes the defendant, Nicholas Anastasiades and asks this honorable court to amend his conditions of pre-trial release by allowing him to travel out of the continental United States. In support thereof the defendant travel plans would have him leave from Boston, Massachusetts on January 1, 2005 to Saint Maarten, returning to Boston on January 8, 2005. The defendant is scheduled to leave Boston on January 1, 2005 at 6:00 a.m., on Delta flight no. 993, traveling to Atlanta. He is scheduled to change plans in Atlanta and leave for Saint Maarten on Delta flight no. 779 at 10:05 a.m., arriving in Saint Maarten at 2:50 p.m.

On January 8, 2005 the defendant is scheduled to leave Saint Maarten on Delta flight 812 at 4:17 p.m., arriving in Atlanta at 7:42 p.m. The defendant is then scheduled to depart Atlanta on Delta flight no. 1113 at 9:38 p.m., arriving in Boston at 11:56 p.m.

The defendant states that his brother has a time-share in Saint Maarten and the defendant wishes to spend time in Saint Maarten with his brother's family and the defendant's nieces and nephews.

In support of this motion, counsel states that Assistant United States Attorney, Michael Pelgro, who is the prosecuting attorney on this case, has assented to this motion as well as the defendant's pre-trial services officer, Basil Cronin.

The defendant respectfully asks this honorable court to allow its' motion.

Respectfully submitted
By: Nicholas Anastasiades

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